

**DANIELLE A. KOLKOSKI, ESQ.**  
Nevada State Bar No. 8506  
**WOLFE & WYMAN LLP**  
6757 Spencer Street  
Las Vegas, NV 89119  
Telephone: (702) 476-0100  
Facsimile: (702) 476-0101  
dakolkoski@wolfewyman.com

**Attorneys for Defendant**  
**DITECH FINANCIAL LLC**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

TERRY L. SHIRLEY,

Plaintiff,

v.

DITECH FINANCIAL LLC, SCE FEDERAL  
CREDIT UNION, TARGET NATIONAL  
BANK, AMERICA HONDA FINANCE  
CORPORATION, UNITED SERVICES OF  
AMERICA FEDERAL CREDIT UNION,  
INNOVIS DATA SOLUTIONS, INC. d/b/a  
INNOVIS, EQUIFAX INFORMATION  
SERVICES LLC, TRANS UNION, LLC AND  
EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendants.

Case No. 2:18- cv-1605

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR  
DEFENDANT DITECH FINANCIAL  
LLC TO RESPOND TO PLAINTIFFS'  
COMPLAINT**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED between Defendant, DITECH  
FINANCIAL LLC (hereinafter, "DITECH") and Plaintiff, TERRY L. SHIRLEY, by and through  
their undersigned attorneys, that DITECH shall have up to and including December 10, 2018 to file a  
Response to Plaintiff's Complaint as the parties are engaging in potential early resolution.

///

///

1 This is DITECH's first request for an extension, and is not intended to cause any delay or  
2 prejudice to any party. Trial has not been set in this case yet.

3 DATED: November 27, 2018

DATED: November 27, 2018

4 WOLFE & WYMAN LLP

KAZEROUNI LAW GROUP, APC

6 By: /s/ Danielle A. Kolkoski

By: /s/ Michael Kind

7 DANIELLE A. KOLKOSKI, ESQ.

MICHAEL KIND ESQ.

8 Nevada State Bar No. 8506

Nevada Bar No. 13903

9 6757 Spencer Street

6069 South Fort Apache Road, Suite 100

10 Las Vegas, NV 89119

Las Vegas, Nevada 89148

11 Attorneys for Defendant

Attorney for Plaintiff

12 Ditech Financial



**ORDER**

Based on the Stipulation of the parties, and good cause appearing therefore,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that DITECH FINANCIAL LLC shall have up to and including December 10, 2018 to file a Response to Plaintiff's Complaint.

**IT IS SO ORDERED.**

Dated this 27th day of November, 2018.

By: 

UNITED STATES MAGISTRATE JUDGE

Submitted by,

DATED: November 27, 2018

WOLFE & WYMAN LLP

By: /s/ Danielle A. Kolkoski

DANIELLE A. KOLKOSKI

Nevada Bar No.: 8506

6757 Spencer Street

Las Vegas, NV 89119

Attorneys for Defendant

**DITECH FINANCIAL LLC**

1 **CERTIFICATE OF MAILING**

2 On November 27, 2018, I served the foregoing **STIPULATION AND ORDER FOR**  
3 **EXTENSION OF TIME FOR DEFENDANT DITECH FINANCIAL LLC TO RESPOND**  
4 **TO PLAINTIFFS' COMPLAINT (FIRST REQUEST)**, by the following means to the persons  
5 as listed below:

6 ☒ a. EFC System (you must attach the "Notice of Electronic Filing," or list all  
7 persons and addresses and attach additional paper if necessary):

8 David H. Krieger, Esq. [dkrieger@hainesandkrieger.com](mailto:dkrieger@hainesandkrieger.com)  
9 Michael Kind, Esq. [mkind@kazlg.com](mailto:mkind@kazlg.com)

10 ☐ b. United States Mail, postage fully pre-paid (List persons and addresses.  
11 Attach additional paper if necessary):

12 David H. Krieger, Esq.  
13 Nevada Bar No. 9086  
14 HAINES & KRIEGER, LLC  
15 8985 S. Eastern Avenue, Suite 350  
16 Henderson, Nevada 89123  
17 and  
18 Michael Kind, Esq.  
19 Nevada Bar No. 13903  
20 KAZEROUNI LAW GROUP, APC  
21 6069 South Fort Apache Road, Suite 100  
22 Las Vegas, Nevada 89148

23 Attorneys for Plaintiff

24 /s/ Jamie Soquena  
25 Jamie Soquena  
26 An employee of Wolfe & Wyman LLP  
27  
28